

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE BARRY WHITE FAMILY
TRUST U/A/D: DECEMBER 19, 1980,
BY ITS DULY EMPOWERED TRUSTEES,

Plaintiffs,

v.

JOE COOLEY,
RODNEY DAVID OLIVER P/K/A
RODNEY-O, d/b/a NOT INTRESTED PUBLISHING

Defendants.

X:	
:	Case No. 1:24-cv-07509
:	
:	
:	
:	
:	
:	
X	

NOTICE OF MOTION TO WITHDRAW AS COUNSEL TO DEFENDANTS

PLEASE TAKE NOTICE that, upon the accompanying Declarations of Timothy C. Matson, Esq. and Philip Z. Langer, Esq., Fox Rothschild LLP (“Movant”) will move this Court, at a date and time to be determined by the Court, for entry of an Order pursuant to Local Civil Rule 1.4, granting Movant permission to withdraw as counsel of record for Defendants Joe Cooley, Rodney David Oliver p/k/a Rodney-O, d/b/a Not Intrested Publishing (“Defendants”) in this action.

Dated: New York, New York
March 21, 2025

FOX ROTHSCHILD LLP

By: /s/ Timothy C. Matson

Timothy C. Matson, Esq. (Pro Hac Vice)
Philip Z. Langer, Esq.
101 Park Avenue, 17th Floor
New York, New York 10178
Telephone: (212) 878-7900
Facsimile: (212) 692-0940
Email: tmatson@foxrothschild.com
Email: planger@foxrothchild.com